

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
ex. rel. MITCHELL D. MONSOUR and
WALTON STEPHEN VAUGHAN

PLAINTIFFS

VS.

CAUSE NO. 1:16CV38HSO-JCG

PERFORMANCE ACCOUNTS RECEIVABLE, LLC,
PERFORMANCE CAPITAL LEASING, LLC,
STEPPING STONES HEALTHCARE, LLC,
WADE WALTERS, CLAYTON V. DEARDORFF,
MIKE BOLEWARE, HOPE THOMLEY,
DENNIS L. PIERCE, and PIERCON, INC.

DEFENDANTS

MOTION FOR ADDITIONAL TIME

COMES NOW HOPE THOMLEY, Defendant in the above-styled and numbered cause, by and through undersigned counsel, without waiving any defense or motion to dismiss herein, and files this Motion For Additional Time to respond to the First Set Of Interrogatories and First Set Of Request For Production Of Documents propounded by Plaintiffs and would state in support thereof the following, to wit:

1.

That Plaintiffs propounded written discovery to Defendant HOPE THOMLEY on April 25, 2018. Said answers are now due.

2.

Defendant appears to be the subject of a federal criminal investigation as well as a federal civil forfeiture suit. Defendant is represented by separate criminal defense counsel, Michael Reed, in said matters.

3.

That Defendant has a right to consult with her criminal defense counsel as well as undersigned counsel. Both counsel have been out-of-town at different times since discovery was propounded by Plaintiffs, and Defendant has not been able to complete discovery.

4.

That Defendant has complied with Pre-Discovery Disclosures, joining in the production of nearly 60,000 pages of documents, and is not filing this Motion For Additional Time in order to cause delay but in the interests of justice, and an extension of time will not cause any party any prejudice. However, Defendant's constitutional rights, and in fact her liberty, could be jeopardized by any rush to respond to discovery without adequate consideration.

WHEREFORE, PREMISES CONSIDERED, Defendant hereby request that this Honorable Court enter its Order allowing her additional time to respond to the written discovery propounded to her by Plaintiffs.

Respectfully submitted,
HOPE THOMLEY

/s/ Carol Ann Bustin

BY: CAROL ANN BUSTIN, Of Counsel

CERTIFICATE OF SERVICE

This is to certify that I, Carol Ann Bustin, attorney for Hope Thomley, has forwarded this date a true and correct copy of the above and foregoing Motion For Additional Time via electronic court filing system to all attorneys and parties of record therein.

This the 5th day of June, 2018.

/s/ Carol Ann Bustin

Carol Ann Bustin

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